

May 20, 1998

NOTE TO INTERAGENCY PERCHLORATE STEERING COMMITTEE

SUBJECT: Action Items for Toxicity Assessment of Perchlorate

FROM: Dorothy Canter

As I will not be able to attend the meeting of the Interagency Perchlorate Steering Committee (IPSC) on May 21, I am submitting this note of proposed upcoming action items for consideration and possible action at the meeting.

1. Commence work on toxicity review document on perchlorate as soon as possible.

(a) Information on production, use, environmental occurrence and physical/chemical properties are readily available and should be included in the document. A number of the participants in the Stakeholders' Forum can supply missing information. These sections can be prepared and reviewed without delay.

(b) Previously published studies and toxicity reports can be reviewed and summarized for inclusion in the ultimate document. In addition, limitations of these studies can be evaluated and presented in the toxicity review document.

2. In addition to using the IRIS format for the toxicity review document, an increased level of detail should be presented on the existing studies as well as on the studies that will be completed in the next weeks and months. For example, numbers of treatment groups, doses and number of animals per treatment group, duration of exposures, sexes and strains of laboratory species used, and special studies included for specific treatment groups need to be presented for each study summarized. Where such information is not included in the published papers or study reports, the summary should specify this lack of information because it will be important in the evaluation of the study.

PEER REVIEW ITEMS

3. Issues to be included in peer review

- (a) Evaluation of adequacy/limitations of newly completed studies (e.g., 90-day subchronic study, genotoxicity studies, etc)
- (b) Toxicity review document/proposed RfD
- (c) Additional toxicity testing needs for more complete evaluation of potential effects on human health

4. Prepare preliminary list of stakeholders who will be asked to submit nominations of experts for peer review at IPSC meeting

Federal government – EPA (OSWER, OW, Region 9 other Regions??), NPS (Lake Mead NRA), Air Force, NASA

State governments – CA, NV, UT, other

Local governments – Las Vegas, Henderson, Sacramento, etc.

Environmental – Nevada Environmental Coalition, EDF, NRDC, other local/national ??

Industrial – Aerojet, Lockheed, American Pacific, other members Perchlorate Study Group, etc.

Tribes – five plus

Individuals – Larry Ladd, etc

Finalize list by mid-June

5. Need to send letter to stakeholders soliciting nominations of experts/resumes at least 14 weeks in advance of planned peer review panel meeting date

- allow four weeks to submit nominations
- allow two weeks to make preliminary selection of peer reviewers
- allow two weeks to make final selection (some experts in first group not available, summer vacations, etc)
- allow four weeks for panel members to review toxicity review document/proposed RfD and submit written comments
- allow one week to transmit comments to entire group/public
- allow one week for potential slippage

Past experience with numerous stakeholders is that they ask for extension of time for submitting nominations

6. Select site of peer review meeting at IPSC meeting (but no later than June 15)